METHFESSEL & WERBEL, ESQS. 450 Seventh Avenue, Suite 1400 New York, NY 10123 (212) 947-1999 Attorneys for BMS Catastrophe, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK EUGENIUSZ SKRZECZKOWSKI AND AJICJA SKRZECZKOWSKI,

Plaintiff.

-AGAINST-

110 CHURCH LLC, 53 PARK PLACE LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., ANN TAYLOR STORESCORPORATION, BATTERY PARK CITY AUTHORITY, BELFORUSA GROUP, INC., BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT., Et.al.

Defendants.

21 MC 102 (AKH)

INDEX NO.: 07CV4517

NOTICE OF ADOPTION OF ANSWER
TO MASTER COMPLAINT

PLEASE TAKE NOTICE THAT Defendant, BMS Catastrophe, Inc. s/h/a Blackmon-Mooring-Steamatic Catastophe, Inc. d/b/a BMS Catastrophe, by their attorneys, Methfessel & Werbel, as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopts their Answer and defenses to the Master Complaint, dated July 26, 2007, which was filed in the matter of: *In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH)*.

To the extent that Defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above captioned matter, Defendant, Defendant, BMS Catastrophe, Inc., denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, the defendant, Defendant, BMS Catastrophe, Inc., demands judgment dismissing the above captioned action as against them, together with costs, disbursements and such other and further relief as this Court deems just and proper.

DATED: New York, New York September 21, 2007

METHFESSEL & WERBEL, ESQS. Attorneys for BMS Catastrophe

Frank g Karon

By:_

Frank J. Keenan (FK 8922) 450 Seventh Avenue Suite 1400 New York, New York 10123 (212) 947-1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies as follows:

- 1. I am employed by the law firm of Methfessel & Werbel.
- $2.\,$ On September 19, 2007 the undersigned prepared and forwarded copies of the within Notice of Adoption , via ECF, to the following parties:

Worby Groner Edelman & Napoli Bern, LLP 5 Broadway, 12th Floor New York, NY 10006 Attorneys for: Plaintiff

All Defense Counsel

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Frank g Karon

Frank J. Keenan